UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	
	X
IN RE SEPTEMBER 11 LITIGATION	:
	21 MC 97 (AKH)
	: This Document Relates To:
	: 03-CV-6800 (AKH)
	Plaintiff: Elaine Teague
	· -
	•
	X

NOTICE ADOPTING MASTER ANSWER OF DEFENDANT ARGENBRIGHT SECURITY, INC.

PLEASE TAKE NOTICE THAT defendant Argenbright Security, Inc. hereby adopts its Master Answer to Plaintiffs' Fourth Amended Flight 77 Master Liability Complaint as its Answer to the Second Amended Complaint in the above-captioned action.

WHEREFORE, defendant Argenbright Security, Inc. respectfully requests that the Second Amended Complaint be dismissed, with costs, attorneys' fees, disbursements, and such other relief as the Court deems just and proper or, if such relief not be granted, then that its liability be limited or reduced as prayed.

Dated: New York, New York November 13, 2007

SIMPSON THACHER & BARTLETT LLP

Βv

Joseph F. Wayland (JFW 7549) David J. Woll (DJW 6896)

425 Lexington Avenue New York, N.Y. 10017-3954 Telephone: (212) 455-2000 Facsimile: (212) 455-2502

Attorneys for Defendant Argenbright Security, Inc.

Document 100

TO:

Donald Migliori, Esq. Michael E. Elsner, Esq. Motley Rice LLC 28 Bridgeside Boulevard P. O. Box 1792 Mount Pleasant, SC 29465 Telephone: (843) 216-9000

Paul J. Hanly, Jr., Esq. Jayne Conroy, Esq. Hanly Conroy Bierstein Sheridan Fisher & Hayes LLP 112 Madison Avenue New York, NY 10016 Telephone: (212) 784-6400

Marc S. Moller, Esq. Kreindler & Kreindler 100 Park Avenue, 18th Floor New York, NY 10017 Telephone: (212) 687-8181 Wrongful Death and Personal Injury Plaintiffs' Liaison Counsel

Robert A. Clifford, Esq. Clifford Law Offices 120 N. LaSalle Street, 31st Floor Chicago, IL 60602 Telephone: (312) 899-9090 Property Damage and Business Loss Plaintiffs' Liaison Counsel

Desmond T. Barry, Jr., Esq. Condon & Forsyth LLP Times Square Tower 7 Times Square New York, NY 10036 Telephone: (212) 490-9100 Defendants' Liaison Counsel

Richard A. Williamson, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza, 35th Floor New York, NY 10006 Telephone: (212) 412-9500 Ground Defendants' Liaison Counsel

Page 3 of 3

Beth D. Jacob, Esq. Schiff Hardin LLP 623 Fifth Avenue, 28th Floor New York, NY 10022 Telephone: (212) 753-5000 WTC 7 Ground Defendants' Liaison Counsel

Elizabeth Goldman, Esq. Assistant U.S. Attorney Southern District of New York U.S. Department of Justice 86 Chambers Street, 3rd Floor New York, NY 10007 Telephone: (212) 637-2732

All Aviation Defense Counsel of Record

CERTIFICATE OF SERVICE

I, Pia Naib, a paralegal with the firm of Simpson Thacher & Bartlett LLP, attorneys for Petitioners Argenbright Security, Inc., certify:

I am over eighteen (18) years of age. On the 13th day of November, 2007, the foregoing Notice Adopting Master Answer of Defendant Argenbright Security, Inc. to Plaintiffs' Fourth Amended Flight 77 Master Liability was served to the parties on the attached service list by electronic mail.

I certify under the penalty of perjury that the foregoing is true and correct.

Ria Mint Pia Naib

Dated: November 13, 2007

Page 2 of 4

SERVICE LIST

Adina Halpern - ahalpern@condonlaw.com

Alison Mikkor - amikkor@debevoise.com

Allen W. Burton - aburton@omm.com

Alun Griffiths - agriffiths@ssbb.com

Ann Taylor - ataylor@lordbissell.com

Anoushka Bayley - abayley@quirkbakalor.com

Anthony U. Battista - abattista@condonlaw.com

Anthony Hom - ahom@jhcb.com

Anthony Orlandi - aorlandi@goodwinprocter.com

Antoinette Greenaway Ellison - antoinette.ellison@dpw.com

Benjamin C. Curcio - bcurcio@seidenwayne.com

Beth D. Jacob - bjacob@schiffhardin.com

Brian Alexander – balexander@kreindler.com

Brian Fraser - bfraser@rsko.com

Brian Melton - bmelton@susmangodfrey.com

Brian Otero - botero@hunton.com

Charles E. Koob - ckoob@stblaw.com

Charles Eskridge - ceskridge@susmangodfrey.com

Christopher Christensen - cchristensen@condonlaw.com

Christopher Howe - chowe@campbell-trial-lawyers.com

Christopher Moore - cmoore@goodwinprocter.com

Christopher Parkerson - cparkerson@campbell-trial-lawyers.com

Courtney Anderson - clanderson@mayerbrownrowe.com

David Bloomberg - david.bloomberg@bryancave.com

David Orozco - dorozco@susmangodfrey.com

David Sass - dsass@mclaughlinstern.com

David Woll – dwoll@stblaw.com

Dennis D'Angelo - DDAngelo@goodwinprocter.com

Desmond T. Barry, Jr. - dbarry@condonlaw.com

Diana Gurfel - dgurfel@condonlaw.com

Donald Migliori – dmigliori@motleyrice.com

Douglas Amster - dha@stjohnlaw.com

Douglas Pepe – dpepe@josephnyc.com

Edward McMurrer - Edward.McMurrer@Mendes.com

Elizabeth Goldman - beth.goldman@usdoj.gov

Eric Lent - elent@perkinscoie.com

Eric McNamar - emcnamar@condonlaw.com

Erin Slusser - eslusser@dglitigators.com

Eugene Lee - elee@condonlaw.com

Gary Westerberg - gwesterberg@lordbissell.com

Grace Wen - gwen@rkollp.com

H. Lee Godfrey - lgodfrey@susmangodfrey.com

Hannah M. Pennington - hmpennington@debevoise.com

Inna Reznik - ireznik@cgsh.com

Filed 11/13/2007

Jaan Kangur – jkangur@fzwz.com

Jackie Wray - jwray@susmangodfrey.com

Jacob W. Stahl - jwstahl@debevoise.com

James Freire - jfreire@jhcb.com

James Gallagher - Jgallagher@ggfc-law.com

James Connors - jconnors@jhcb.com

James Rittinger - jrittinger@ssbb.com

Jayne Conroy – jconroy@hanlyconroy.com

Jean C. Rose - jrose@condonlaw.com

Jeannette Vargas - jeannette.vargas@usdoj.gov

Jeff Ellis - jellis@quirkbakalor.com

Jeff McLaren - jmclaren@susmangodfrey.com

Jeffrey Moryan - Jmoryan@connellfoley.com

Joe Wayland - jwayland@stblaw.com

John Cooney, Jr. - john.cooney@dpw.com

John McHenry - Jmchenry@connellfoley.com

Jonathan A. Azrael – jazrael@agflaw.com

Jonathan Blackman - jblackman@cgsh.com

Jonathon Ross - jross@susmangodfrey.com

Judson H. Lipowitz – jlipowitz@agflaw.com

Jung Lee - jmlee@condonlaw.com

Karen Berberich - Kberberich@dglitigators.com

Karin Bell - kbell@goodwinprocter.com

Karen Artusa - kartusa@quirkbakalor.com

Karyn Yaffee - kyaffee@omm.com

Kate Fitzpatrick - kfitzpatrick@chadbourne.com

Katherine Szijarto - kszijarto@connellfoley.com

Kathleen Gulifoyle - kguilfoyle@campbell-trial-lawyers.com

Kenneth P. Nolan – kpn@ny.speiserkrause.com

Kerry E. Kolodziej - kkolodziej@mayerbrownrowe.com

Lana Milojevic - lmilojevic@rkollp.com

Laura D. Murphy – lmurphy@stblaw.com

Laurie Kachonick - lkachonick@connellfoley.com

Lee Richards - lrichards@rsko.com

Leigh Van Ostrand - lvanostrand@condonlaw.com

Loretta Redmond - lredmond@quirkbakalor.com

Lori Siembieda – lsiembieda@stblaw.com

Mack Shultz - mshultz@perkinscoie.com

Marc S. Moller - mmoller@kreindler.com

Mark Dombroff - Mdombroff@dglitigators.com

Mark Wood - mwood@omm.com

Mary Chang - mmchang@bryancave.com

Mary Gaston - mgaston@perkinscoie.com

Maura Monaghan - mkmonaghan@debevoise.com

M. Bradford Stein - bstein@fzwz.com

Mia DeFranco - mdefranco@goodwinprocter.com

Michael Bojbasa – mbojbasa@ggfc-law.com

Michael Crowley - mcrowley@ggfc-law.com

Michael E. Elsner – melsner@motleyrice.com

Michael Feagley - mfeagley@mayerbrownrowe.com

Michael Kerns - mkerns@dglitigators.com

Michael Koueiter - mkoueiter@condonlaw.com

Michael Peterson - mpeterson@condonlaw.com

Neal Manne - nmanne@susmangodfrey.com

Neal Potischman - potisch@dpw.com

Neil Binder - nbinder@rsko.com

Nick Daum - ndaum@susmangodfrey.com

Paul Kelly - pkelly@klhboston.com

Paul Koepff - pkoepff@omm.com

Paul J. Hanly, Jr. – phanly@hanlyconroy.com

Paul Robbins - probbins@mclaughlinstern.com

Paul Ware, Jr. - pware@goodwinprocter.com

Peter Skoufalos - pskoufalos@browngavalas.com

Peter Van Deventer, Jr. - pbv@stjohnlaw.com

Peter Vetro – pvetro@ggfc-law.com

Ralph Pagano - Ralph.Pagano@mendes.com

Richard Campbell - rpcambell@campbell-trial-lawyers.com

Richard A. Williamson - rwilliamson@fzwz.com

Robert Brown - rjb@browngavalas.com

Robert Clifford – rac@cliffordlaw.com

Robert Goodman – rdgoodman@debevoise.com

Roger Podesta - repodesta@debevoise.com

Sarah Connelly - sconnelly@condonlaw.com

Sarah Haan - shaan@rsko.com

Sarah Normand - Sarah.Normand@usdoj.gov

Tara McCabe - Tara.McCabe@mendes.com

Terrianne Muenzen - tmuenzen@debevoise.com

Thomas J. McCormack - tmccormack@chadbourne.com

Thomas McLaughlin - tmclaughlin@perkinscoie.com

Timothy Keane - tkeane@quirkbakalor.com

Timothy Tomasik - tst@cliffordlaw.com

Todd Rosencrans - trosencrans@perkinscoie.com

Veronica Maginnis - vmaginnis@ssbb.com

Victoria A. Turchetti - vturchetti@condonlaw.com